

## Comment on FCC Docket 18-120: Transforming the 2.5 GHz Band

I am Maria Hadden, a board member of the Chicago Instructional Technology Foundation (CITF), which is one part of Voqal, a national collaboration of EBS licensees. We work within the FCC rules to provide access to internet for schools and to leverage the spectrum licensed to us to serve the public interest.

CITF makes grants and impact investments, expands internet access and digital equity, supports fellowships and advocates for EBS licensees. Voqal is able to invest substantially in education in local communities with money from spectrum leases.

CITF looks for ways to address the opportunity gap and empower and educate the public beyond school age. In Chicago, we help build strong communities by funding local news through City Bureau and local filmmakers through the Chicago Digital Media Production Fund with Chicago Filmmakers. Through our Education Opportunity Project, we seek to measurably reduce educational opportunity gaps by providing capital and strategic advice to entrepreneurs and organizations working to improve educational outcomes for disadvantaged populations. In an age where civics education has been left out of many curricula, we provide new media civics lessons via YouTube, and support citizen education and participation through projects we support.

Like my colleagues, I believe the FCC should keep educational eligibility and modernize rather than eliminate the educational use requirement.

EBS has provided substantial benefits to educators for nearly 50 years. Since 1963, this band has always been intended for educational use, and EBS is one of the few bands that is dedicated to public or nonprofit use – public radio and public television are two of the others. Nearly every other spectrum band is either used by the government, licensed to commercial entities or unlicensed for Wi-Fi use.

Right now, the FCC has an opportunity to modernize the rules for the broadband world and deliver an even greater benefit to students, schools and communities. CITF is dedicated to helping the FCC modernize these rules.

Also, I believe that the FCC should expand existing licenses to county boundaries. One of the major goals of this rulemaking is to make available unused spectrum adjacent to existing licenses. County boundary expansion has several benefits, including allowing for more rapid deployment of 5G networks.

As the recent broadcast incentive auction has shown, it could take up to a decade to develop and conduct an auction, repack incumbents, and clear the way for commercial entities to use this spectrum. Auctions make little sense given the relatively simple task of expanding licenses to cover more territory and serve more people. Also: an auction would waste valuable

educational resources by forcing schools to out bid one another.

Thank you,

Maria Hadden